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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CORRY ALEXIS HAWKINS,

Petitioner,

v.

CALVIN JOHNSON, *et al.*,

Respondents.

Case No. 2:20-cv-01852-CDS-VCF

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
RESPONSE TO SECOND AMENDED
PETITION FOR WRIT OF HABEAS
CORPUS (ECF NO. 22)**

(THIRD REQUEST)

Respondents move this Court for an enlargement of time of 45 days from the current due date of July 18, 2022, up to and including September 1, 2022, in which to file their Response to Hawkins' Second Amended Petition for Writ of Habeas Corpus (ECF No. 22). This Motion is made pursuant to FED. R. CIV. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel.

This is the third enlargement of time sought by Respondents and is brought in good faith and not for the purpose of delay.

DATED July 15, 2022

Submitted by:

AARON D. FORD
Attorney General

By: /s/ Katrina A. Samuels
Katrina A. Samuels (Bar No. 13394)
Deputy Attorney General

DECLARATION OF KATRINA A. SAMUELS

I, Katrina A. Samuels, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been assigned to represent Respondents in *Corry Alexis Hawkins. v. Calvin Johnson, et al.*, Case No. 2: 20-cv-01852-CDS-VCF, and as such, have personal knowledge of the matters contained herein.

2. This Motion is made in good faith and not for the purpose of delay.

3. The Response to Hawkins' Second Amended Petition is currently due on Monday, July 18, 2022.

4. Respondents have been unable with due diligence to timely complete the Response.

5. In the past few months, Respondents filed a response to a motion to strike filed May 2, 2022 (*Slater Lance Yohey v. Perry Russell, et al.*, Case No. 3:20-cv-00441-ART-CLB); a renewed motion to dismiss filed May 2, 2022 (*Slater Lance Yohey v. Perry Russell, et al.*, Case No. 3:20-cv-00441-ART-CLB); an answering brief in the Ninth Circuit filed May 9, 2022 (*John Michael Farnum v. Robert Legrand, Warden; Attorney General for the State of Nevada*, Case No. 21-15529); an opposition to motion for recusal filed May 11, 2022 (*Justin Odell Langford v. Warden Renee Baker, et al.*, Case No. 3:19-cv-00594-MMD-CSD); an opposition to motion to reconsider motion to amend petition filed May 16, 2022 (*Justin Odell Langford v. Warden Renee Baker, et al.*, Case No. 3:19-cv-00594-MMD-CSD); a reply in support of motion to dismiss filed May 31, 2022 (*Markiece Palmer v. William Gittere, et al.*, Case No. 3:18-cv-00245-HDM-CLB); a reply in support of motion to dismiss filed June 20, 2022 (*Christopher Lenard Blockson v. Jerry Howell, et al.*, Case No. 2:21-cv-00731-GMN-VCF); supplemental briefing in the Ninth Circuit filed June 29, 2022 (*Darrell Connors v. William Hutchings, Warden; Attorney General for the State of Nevada*, Case No. 21-15693); a motion to dismiss filed July 7, 2022 (*Kwame Anir Saafir v. City of Las Vegas, et al.*, Case No. 2:21-cv-01832-JAD-VCF); and various responses in state post-conviction cases.

6. Respondents communicated with counsel for Hawkins regarding this extension and she does not object to this request.

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing *Unopposed Motion for Enlargement of Time to File Response to Second Amended Petition for Writ of Habeas Corpus (ECF No.22) (Third Request)* with the Clerk of the Court by using the CM/ECF system on July 15, 2022.

The following participants in this case are registered CM/ECF users and will be served by the CM/ECF system:

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/s/ J. Gochuico
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